

WK:AS  
F. #2023R00758

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

TYRONE SANTOS,

Defendant.

----- X  
THE GRAND JURY CHARGES:

FILED  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.  
\* OCTOBER 31, 2023 \*  
BROOKLYN OFFICE

I N D I C T M E N T

Cr. No. **23-CR-436**  
(T. 18, U.S.C., §§ 981(a)(1)(C), 1704,  
2114(a) and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C., § 2461(c))

**Judge Orelia E. Merchant**  
**Magistrate Judge Ramon E. Reyes, Jr**

COUNT ONE

(Robbery of a Person Having Custody of Property of the United States)

1. On or about September 30, 2023, within the Eastern District of New York and elsewhere, the defendant TYRONE SANTOS did knowingly and intentionally assault a person having lawful charge, control and custody of property of the United States, to wit: a United States Postal Service ("Postal Service") mail carrier, with intent to rob such property, and did rob and attempt to rob such person of such property.

(Title 18, United States Code, Sections 2114(a) and 3551 et seq.)

COUNT TWO

(Theft of United States Postal Service Key)

2. On or about September 30, 2023, within the Eastern District of New York and elsewhere, the defendant TYRONE SANTOS did knowingly and intentionally steal, purloin and embezzle a key to one or more authorized receptacles for the deposit and delivery of mail matter, to wit: a Postal Service relay box key.

(Title 18, United States Code, Sections 1704 and 3551 et seq.)

COUNT THREE

(Robbery of a Person Having Custody of Property of the United States)

3. On or about October 14, 2023, within the Eastern District of New York and elsewhere, the defendant TYRONE SANTOS did knowingly and intentionally assault a person having lawful charge, control and custody of property of the United States, to wit: a Postal Service mail carrier, with intent to rob and attempt to rob such person of such property, and did rob and attempt to rob such person of such property, and in effecting and attempting to effect such robbery SANTOS did put such person's life in jeopardy by the use of a dangerous weapon, to wit: a gun.

(Title 18, United States Code, Sections 2114(a) and 3551 et seq.)

COUNT FOUR

(Theft of United States Postal Service Key)

4. On or about October 14, 2023, within the Eastern District of New York and elsewhere, the defendant TYRONE SANTOS did knowingly and intentionally steal, purloin and embezzle a key to one or more authorized receptacles for the deposit and delivery of mail matter, to wit: a Postal Service relay box key.

(Title 18, United States Code, Sections 1704 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

5. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

Mary Beth Glickman  
FOREPERSON

By Carolyn Pokorsy, Assistant U.S. Attorney

BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F.#: 2023R00758  
FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

TYRONE SANTOS,

Defendant.

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**INDICTMENT**

(T. 18, U.S.C., §§ 981(a)(1)(C), 1704, 2114(a) and 3551 et seq.; T. 21,  
U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

*A true bill.*  
Mary Beth Gleichman \_\_\_\_\_  
Foreperson

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
Clerk  
Bail, \$ \_\_\_\_\_

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*Amanda Shami, Assistant U.S. Attorney (718) 254-7528*